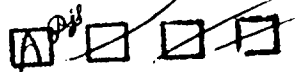


September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.



29/OPP #34133

3PP

FMC Corporation

Agricultural Chemical Group
1735 Market Street
Philadelphia Pennsylvania 19103
215 299 6000

FMC

December 16, 1994

FEDERAL EXPRESS

Mr. Lawrence J. Schnaubelt
Section Head
Reregistration Branch, Section II
Special Review and Reregistration Division H7508W

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Schnaubelt:

Subject: Reregistration Case Number/Name: 0090 - Ethion
Chemical Number/Name: 058401 - Ethion
Registrant Number 279

Environmental Fate & Effects Division Reviews - 10/11/94

This is in regards to the Ecological Effects Branch (EEB) and Environmental Fate and Groundwater Branch (EFGWB) reviews enclosed with a letter to FMC Corporation dated October 11, 1994 (received on October 17, 1994). These reviews provide an evaluation of the current EPA ethion EFED data base.

Subsequent to receiving these reviews, on November 15, 1994, a request was made by the EPA (phone conversation between Lawrence Schnaubelt and Sidney McDaniel) to FMC Corporation to submit to the Agency by November 16, 1994, potential risk mitigation measures for the use of Ethion 4 Miscible on citrus in Florida and Texas. Those measures as discussed were then forwarded to your attention by facsimile.

Outlined in this letter are the above mentioned risk mitigation measures (see attachment).

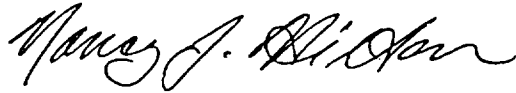
In discussion with Robert Richards, EPA, it has been expressed to me that the EPA has an interest in having a technical review meeting to discuss possible risk mitigation measures for ethion in response to the above reviews. At this time I am proposing that a meeting be scheduled at the EPA the week of January 16, 1995, with both Agency and FMC Corporation technical and registration personnel in attendance. Please let me know what date is most convenient.

1

Mr. Lawrence Schnaubelt
December 16, 1994
Page 2

If you have any questions, please do not hesitate to call.

Most sincerely,

A handwritten signature in cursive script, appearing to read "Nancy J. Hilton".

Nancy J. Hilton
Product Development and Registrations Manager
(215) 299-6753

Attachment

cc: Sidney McDaniel (FMC)
Robert Richards (EPA/SRRD)

Ethion 4 Miscible
EPA Registration No. 279-1254

Citrus Use - Florida and Texas Only

Summary of Facsimile Message Dated November 15, 1994

1. Risk Mitigation Label Language Open to FMC for Discussion:

Not currently on label:

- Controlling Droplet Size
- Application Height
- Swath Adjustment
- Wind Restriction
- Temperature and Humidity
- Inversion Conditions
- Sensitive Area Avoidance
- Vegetative Strips
- Orchard Periphery Specifics

2. Additional Areas for Mitigation:

- Possibility of reducing current 9 lbs. ai/acre/season label rate to 8 lbs. ai/acre/season.
- Reducing current four applications per season to three applications per season is realistic.
- Reducing current 250 gallons/acre minimum to near 100 gallons/acre may be reasonable.

FMC Corporation
1735 Market Street
Philadelphia, PA. 19103

December 16, 1994